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November 17, 2005

Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RE: Cincinnati Bell Wireless LLC's Hearing Aid Compatibility Report
WT Docket No. 01-309

Dear Ms. Dortch:

Pursuant to the Commission's Hearing Aid Compatibility *Report and Order*, WT Docket No. 01-309 (rel. August 14, 2003) and its *Order on Reconsideration and Further Notice of Proposed Rulemaking* (rel. June 21, 2005), Cincinnati Bell Wireless LLC ("CBW") hereby submits the following report related to the hearing aid compatibility of its wireless handsets.

CBW holds licenses for Broadband PCS services in the Cincinnati and Dayton, Ohio Basic Trading Areas ("BTAs"), covering the greater Cincinnati metropolitan area as well as several counties in northern Kentucky and Indiana. CBW currently provides service to customers via the TDMA and GSM air interfaces using handsets manufactured by Blackberry, Motorola, Nokia, and Sony Ericsson.

With respect to the hearing aid-compatibility compliance of its GSM handsets, CBW currently offers two handsets with lower RF emissions: the Motorola V220 and the Nokia 6061. Thus, CBW currently complies with the September 16, 2005 benchmark for the GSM interface. However, while CBW operates in the 1900 MHz spectrum only, CBW wishes to avail itself of the relief provided in the *Order on Reconsideration* which allows carriers to base the hearing aid-compatibility compliance rating of dual-mode GSM handsets on their operation in the 1900 MHz band only until August 1, 2006. CBW understands that its manufacturing partners are working to make hearing aid compatible dual-band handsets available before the August 1st deadline and that they will inform CBW when such handsets are available.

Moreover, CBW takes this opportunity to notify the Commission that it is in the process of overbuilding its TDMA network. Because the overbuild will be completed by September 18, 2006, and because CBW provides two hearing aid-compatible handset models to customers receiving service from the GSM network, CBW is considered to be in compliance with the

September 16, 2005 benchmark with respect to its TDMA network pursuant to the relief granted to carriers that intend to fully replace their existing TDMA networks in the *Order on Reconsideration*.

With respect to the specific information sought by the Commission, CBW states as follows:

- 1) **Digital wireless phones tested:**
CBW relies on handset manufactures to test handsets for compliance with the ANSI C63.19 standard. CBW does not conduct independent tests of handsets to ensure compliance with the compatibility standard.
- 2) **Laboratory used:**
N/A
- 3) **Test results for each phone tested:**
N/A
- 4) **Identification of compliant phone models and ratings according to ANSI C63.19:**
CBW currently offers two handsets with lower RF emissions: the Motorola V220 and the Nokia 6061. Each of these handset models are rated M3.
- 5) **Status of product labeling:**
CBW relies on handset manufactures to label all products prior to delivery to CBW. Once handset manufacturers label handsets to indicate hearing aid compatibility, CBW will ensure that this information is available to customers via its retail outlets.
- 6) **Outreach efforts:**
As indicated above, CBW will ensure that information related to the hearing aid compatibility of a particular handset is made available to customers via its retail outlets. CBW is also in the process of updating its Web site to include such information CBW will also make this information available to organizations that assist persons with hearing disabilities as appropriate.
- 7) **Retail availability of compliant phones:**
See response to number 4, above.
- 8) **Incorporation of hearing aid compatibility features into newer models of digital wireless phones:**
Please see individual manufacturers' reports for information.
- 9) **Activities related to ANSI C63.19/other standards work:**
CBW is not a member of the ATIS Incubator Solutions Program 4 and is not involved in activities related to standards work.

- 10) **Number of compliant and non-compliant phone models offered:**
CBW currently offers the following handsets and accessibility accessories:

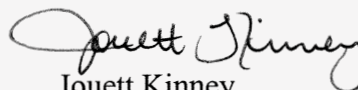
| Handset Models | Accessibility Accessories |
|--|---|
| Blackberry Models 7290 & 7100g | OEM HATIS Univ. 2.5mm T-Coil Adaptor, OEM 2.5mm Cord TTY Adaptor |
| Motorola Models V180, V220, V555 | OEM HATIS Univ. 2.5mm T-Coil Adaptor, OEM 2.5mm Cord TTY Adaptor |
| Nokia Models 3120, 3220, 6102 and 6230 | HAD-10 Headset/TTY Adaptor, LPS-4 Accessibility Loopset |
| Nokia Models 6010 & 6061 | HAD-9 Headset/2.5mm TTY Adaptor, LPS-3 Accessibility Loopset |
| Sony Ericsson Models T290 and Z520a | Sony Ericsson Handset Adaptor, OEM HATIS Univ. 2.5mm T-Coil Adaptor, OEM 2.5mm Cord TTY Adaptor |
| Samsung Model x427m | Samsung 427m Handset Adaptors, OEM HATIS Univ. 2.5mm T-Coil Adaptor, OEM 2.5mm Cord TTY Adaptor |

CBW will offer its customers compliant handsets when they become available.

- 11) **Ongoing efforts for interoperability testing with hearing aid devices:**
N/A

Any questions about this report should be directed to me at (513) 397-7260 or by email at jouett.kinney@cinbell.com.

Sincerely,



Jouett Kinney
Regulatory Attorney
Cincinnati Bell